

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
FIRST GUARANTY MORTGAGE	)	Case No. 22-10584 (CTG)
CORPORATION, <i>et al.</i> , <sup>1</sup>	)	
	)	(Jointly Administered)
	)	
Debtors.	)	<b>Objection Deadline: August 1, 2022 at 2:00 p.m. ET</b>
	)	<b>Hearing Date: August 2, 2022 at 10:00 a.m. ET</b>
	)	
	)	<b>Related to Docket No. 160</b>

**NOTICE OF HEARING ON MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I)  
APPROVING KEY EMPLOYEE INCENTIVE PROGRAM, (II) KEY EMPLOYEE  
RETENTION PROGRAM, AND (III) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that on July 20, 2022, the above-captioned debtors and debtors-in-possession (the “Debtors”), filed the *Motion of Debtors for Entry of an Order (I) Approving Key Employee Incentive Program, (II) Key Employee Retention Program, and (III) Granting Related Relief* [Docket No. 160] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Bankruptcy Court”). **YOU WERE PREVIOUSLY SERVED WITH A COPY OF THE MOTION.**

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the entry of an order with respect to the relief sought in the Motion must be filed with the Bankruptcy Court on or before **August 1, 2022 at 2:00 p.m. Eastern Time.**

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (i) proposed counsel to the Debtors, Dentons US

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

LLP, 601 S. Figueroa Street, #2500, Los Angeles, CA 90017, Attn: Samuel R. Maizel, Esq. (samuel.maizel@dentons.com) and Tania M. Moyron, Esq. (tania.moyron@dentons.com) and Dentons US LLP, 1900 K Street, NW, Washington, DC 20006, Attn: David F. Cook (david.f.cook@dentons.com); (ii) proposed co-counsel to the Debtors, Pachulski, Stang, Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, DE 19801, Attn: Laura Davis Jones, Esq. (ljones@pszjlaw.com), Timothy P. Cairns, Esq. (tcairns@pszjlaw.com), and Mary F. Caloway, Esq. (mcaloway@pszjlaw.com); (iii) proposed counsel to the Official Committee of Unsecured Creditors, Thompson Coburn Hahn & Jessen LLP, 488 Madison Avenue, New York, New York 10022, Attn: Mark S. Indelicato, Esq. (mindelicato@thompsoncoburn.com), and Mark T. Power, Esq. (mpower@thompsoncoburn.com); (iv) proposed co-counsel to the Official Committee of Unsecured Creditors, Blank Rome LLP, 1201 Market Street, Suite 800, Wilmington, Delaware 19801, Attn: Regina Stango Kelbon, Esq. (regina.kelbon@blankrome.com), Victoria A. Guilfoyle, Esq. (tori.guilfoyle@blankrome.com), and Lawrence R. Thomas III, Esq. (Lorenzo.thomas@blankrome.com); and (v) the Office of The United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Benjamin Hackman, Esq. (benjamin.a.hackman@usdoj.gov).

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE MOTION WILL BE HELD ON AUGUST 2, 2022 AT 10:00 A.M. EASTERN TIME BEFORE THE HONORABLE CRAIG T. GOLDBLATT, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES BANKRUPTCY**

COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 3RD FLOOR,  
COURTROOM NO. 7, WILMINGTON, DELAWARE 19801.

Dated: July 20, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
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-and -

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*Proposed Counsel for Debtors and Debtors in  
Possession*